



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

JUL 18 2012

Ms. Ariel Leonard  
Forest Planner  
Attn: Forest Plan Revision Team  
Kaibab National Forest  
800 South 6<sup>th</sup> Street  
Williams, Arizona 86046

Subject: Draft Environmental Impact Statement for the Kaibab National Forest Land and Resource Management Plan, Coconino, Yavapai, and Mojave Counties, Arizona (CEQ# 20120111)

Dear Ms. Leonard:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Kaibab National Forest Land and Resource Management Plan pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The EPA commends the Forest Service for the commitment to restoration and adaptive management demonstrated in the Kaibab Land and Resource Management Plan. Implementing the four broad goals identified in the plan revision—to modify stand structure and restore historic fire regimes; protect and regenerate aspen; protect natural waters; and restore grasslands—will be crucial to restoring the Kaibab National Forest to desired conditions. We also strongly support the ongoing collaboration between the Kaibab, Coconino, and Apache-Sitgreaves National Forests to sustainably manage Arizona's federal ponderosa pine and mixed conifer forests, both through revisions of your respective land management plans, as well as through the Four Forest Restoration Initiative, the landscape-scale planning effort to restore 2.4 million acres of forest lands in northern Arizona.

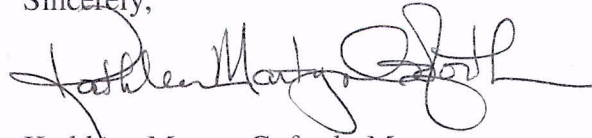
Based on our review of the DEIS, we have rated the preferred alternative and the document as LO-1, Lack of Objections – Adequate (see enclosed EPA Rating Definitions). The EPA recognizes the need for the use of mechanical thinning and prescribed fire and wildfire to achieve long-term restoration objectives. We commend the Forest Service for committing, in the preferred alternative, to strong best management practices and soil and water conservation practices to protect sensitive resources during mechanical harvest and fire treatments. We would also like to acknowledge the thorough description, in the DEIS, of the possible effects of climate change on the Kaibab National Forest, and the commitment, through the preferred alternative, to mitigate those effects.

We recognize the challenge the Forest Service faces by implementing a management plan that will rely heavily on prescribed burns and wildfire to achieve restoration objectives. We commend the Forest Service for preparing an "Air Quality Specialist Report" for this plan that explains these challenges. Though the planning area has good air quality, and meets all federal ambient air quality standards, the fine particulate matter generated during wildland fire does present a human health risk. We recommend that the Forest Service implement BMPs and work with the interagency Smoke Management Group to reduce emissions from prescribed burns and wildfires to the greatest possible extent.

We appreciate the opportunity to review this DEIS, and are available to discuss our comments. When the FEIS is released for public review, please send one hard copy and one CD-ROM to the address above (Mail Code: CED-2). If you have any questions, please contact me at 415-972-3521, or contact Jason Gerdes, the lead reviewer for this project. Jason can be reached at 415-947-4221 or [gerdes.jason@epa.gov](mailto:gerdes.jason@epa.gov).

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Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen Martyn Goforth". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Kathleen Martyn Goforth, Manager  
Environmental Review Office

Enclosure: Summary of the EPA Rating System